

### REMARKS

This is intended as a full and complete response to the Office Action dated September 26, 2003, having a shortened statutory period for response set to expire on December 26, 2003. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-46 are pending in the application, and remain pending following entry of this response, as no claims have been cancelled. Although Applicant has made amendments to the claims, Applicant submits that the amendments do not introduce new matter.

Claims 1-3, 5-9, 12-19, 22, 24-26, 28-32, 35-42 and 45 stand rejected under 35 USC § 102 (b) as being anticipated by *Brandle* (US Patent No. 5,218,699). Applicant respectfully traverses the rejection and submits that *Brandle* fails to teach or disclose each limitation recited in Applicant's claims.

*Brandle* teaches a methodology for routing functions and function related data to remote nodes for execution. The method of *Brandle* includes sending function related data, pointers, arrays, procedure calls, etc. to the remote node for use in executing the function. However, each of Applicant's independent claims 1, 12, 24, and 35 recite generating a pure value buffer that is sent to the remote node with the function. The pure value buffer is described in Applicant's specification as a buffer that includes only data representing the actual values that are to be used by the function, and not pointers or procedure calls that will require the remote node to undertake additional processing steps and overhead to execute the function, as described in *Brandle*. (See, paragraphs 55, 56, 62, 67, and 68.) Further, each of independent claims 1, 12, 24, and 35 also recite a flattening step, which includes the process of removing and/or compressing portions of data that are to be transferred across the network to the remote node, which is not taught or disclosed by *Brandle*. (See, paragraphs 37-40, 44, 55-58, and 61-67.)

Therefore, Applicant submits that independent claims 1, 12, 24, and 35 recite subject matter that is not taught or disclosed by *Brandle*. As such, reconsideration of the rejection of claims 1, 12, 24, and 35, along with all claims depending therefrom, is respectfully requested.

Claims 4, 10-11 20-21, 23, 27, 33-34, 43-44 and 46 stand rejected under 35 USC § 103 (a) as being unpatentable by *Brandle* in view of *Wrabetz* (US Patent No. 5,442,791). *Wrabetz* is directed to a remote execution system for a computer network, wherein procedure calls are transferred to remote nodes for execution. However, *Wrabetz* does not teach generating and transmitting a pure value buffer associated with the function to the remote node. Further, *Wrabetz* does not teach flattening information sent to the remote node. Applicant submits that each of these limitations are contained in Applicant's independent claims 1, 12, 24, and 35, and as such, Applicant submits that each of these claims, along with each claim depending therefrom, recites subject matter that is neither taught, disclosed, or otherwise suggested by the combination of *Brandle* and *Wrabetz*. As such, reconsideration and withdrawal of the rejection is respectfully requested.

Additionally, with regard to the §103 rejection, although the Examiner takes the position that *Wrabetz* teaches caching function related data, Applicant submits that a careful reading of *Wrabetz* does not support this conclusion. More particularly, in support of this conclusion the Examiner cites to column 19, lines 30-68 of *Wrabetz*, which Applicant submits describes the variables associated with *Wrabetz*'s Netmake command. The variable list indicates that the variable "a" represents a flag associated with searching and caching. However, the variable list of *Wrabetz* does not teach, show, or suggest caching function results once a function is executed on a remote node, as recited in Applicant's claims. As such, the Examiner's reconsideration of the rejection of claims 4, 10-11 20-21, 23, 27, 33-34, 43-44 and 46 is respectfully requested.


The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

PATENT

Atty. Dkt. No. ROC920010003US1

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Gero G. McClellan  
Registration No. 44,227  
MOSER, PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)